

**REMARKS**

On an initial note Applicants wish to thank the Examiner for the courtesies extended to the Applicants' representative during a telephone interview on November 12, 2009, in which the Applicants' representative and the Examiner discussed aspects of the first set of claims not found in the cited documents. It was acknowledged that by specifying "enterprise" in the claim language of Claim 5, the claim would define over the cited documents. Further, specific claim elements of certain claims of the first set of claims were discussed, but it was agreed that it would be best to present arguments regarding such claimed elements in the present Response to Office Action to provide the Examiner sufficient time to review of the cited documents to verify the non-existence or existence of such elements.

Claims 1-5, 8, 10-13, 15-23, 25-27, 29-34, 36-40, and 42-43, have been examined. Claims 6-7, 9, 14, 24, 28, 35, and 41 were previously canceled. Claims 1-5, 8, 10-13, 15-23, 25-27, 29-34, 36-40, 42, and 43, are presently rejected, with Claims 1-2, 8, 10, 12, 15, 17, 20, 22-23, 25, 29, 31, 33, 36-40 being objected to. Claims 1-5, 8, 10, 12-13, 15, 17-23, 25, 27, 29-30, 31-33, 36-37, and 38-40, are presently amended, with Claims 34 42-43 being presently canceled and Claims 44-50 being newly added to replace the presently canceled claims. Accordingly, Claims 1-5, 8, 10-13, 15-23, 25-27, 29-33, 36-40, and 44-50 are pending with this Response to Office Action.

Support for the amendments to Independent Claims 1 and 17, which incorporate the features of prior Claim 3, can be found, for example, in Application Publication para. [0042]. Support for the amendments to Independent Claims 31 and 44, which incorporate the features of amended prior Claim 5 indicated by the Examiner during the interview as including allowable subject matter, can be found, for example, in Application Publication paras. [0010, 0023, 0039]. Support for the amendments to Claims 2-4, 8, 10, 12, 18-23, 25, 30, 36-37, and 38-40, can be found in the claims themselves, and throughout. Support for the amendments to Claims 5 and 32, can be found, for example, in Application Publication paras. [0010, 0039]. Support for the amendments to Claims 13 and 27 can be found, for example, in Application Publication paras. [0037, 0044]. Support for the amendments to Claims 15, 29, and 33, can be found, for example, in Application Publication para. [0035]. Support for new Claims 45-50 can be found, for example, in prior Claims 18-20, 23, 26, and 30, and throughout.

Applicants submit that these amendments and corrections herein are made without prejudice as to patentability, including the doctrine of equivalents, and not to overcome prior art, and that no new matter has been added. Although Applicants do not believe any fees are required, the Director is, however, hereby authorized to charge or credit any fees to Bracewell & Giuliani LLP, Deposit Account No. 50-0259 (Attorney Docket No. 0408RF.045828(TA657)).

**Claims 1-5, 8, 10-13, 15-23, 25-27, 29-33, 36-40, and 44-50 are Not Obvious**

Claims 1-4, 8, 11-13, 15-21, 29-31, 33-34, 36, 38-39, and 42-43, were rejected under 35 U.S.C. § 103(a) as being unpatentable over Goodwin et al., U.S. Patent No. 7,209,906 ("Goodwin") in view of Pakhomov, U.S. Patent No. 7,028,038 ("Pakhomov"); Claims 5, 22, and 32, were rejected under 35 U.S.C. § 103(a) as being unpatentable over Goodwin in view of Pakhomov and in further view of Barney, U.S. Patent No. 6,070,143 ("Barney"); Claims 10, 37, and 40, were rejected under 35 U.S.C. § 103(a) as being unpatentable over Goodwin in view of Pakhomov and in further view of Kravets et al., U.S. Patent No. 6,362,377 ("Kravets"); and Claims 23 and 25-27, were rejected under 35 U.S.C. § 103(a) as being unpatentable over Goodwin in view of Pakhomov and Barney and in further view of Kravets. Applicants respectfully submit that neither of the cited patent documents, alone nor in combination, disclose, teach, or suggest all featured method steps/operations or the featured processing module to perform the featured steps/operations as previously presented. Nevertheless, Applicants have presented claim amendments in order to expedite prosecution of the application. Accordingly, Applicants further respectfully submit that the currently amended claims are nonobvious at least for the reasons provided below:

Goodwin, in the field of tracking relationships and affinities in a knowledge management system, describes, for example, a system and method for synchronizing profile data based on one or more changes in relationship information (i.e., affinity) between individuals and subject matter/knowledge data, typically via use of metadata information associated with stored content. Goodwin further describes that its method and system include provisions for: mapping information stored in a data repository to a user having an affinity to such information; identifying changes in affinities of one or more persons to the information and synchronizing the changes with profile data associated with the one or more persons; and allowing a user to search

knowledge data based on the user affinity to the information. Goodwin also describes that its system can establish a training set (special subset of data repositories) used to build the first draft of a knowledge map, and a spider capable of accessing one or more databases to extract the necessary relationship information between individuals and subject matter.

Pakhomov, in the field of probabilistic modeling of text, unrelated to that of Goodwin or to that of the present Application, describes, for example, a system and method for electronically generating training data (feature vectors) used in conjunction with the "Maximum Entropy" statistical technique or other probabilistic models for abbreviation and acronym normalization in medical or other kinds of texts. Pakhomov further describes utilizing a corpus of clinical notes or other health records in which the expansions of the abbreviations to be trained are found.

Barney, in the field of computer-based systems and methods for assessing work requirements relating to jobs and linking human resource products to the assessed jobs, also unrelated to that of Goodwin or to that of the present Application, describes, for example, a job analysis system and method of operating a computer to perform a job analysis. Barney further describes providing a notification to a job analysis subject matter expert of a network address of a preliminary survey for completion by the subject matter expert.

Kravets, in the field of search techniques used on information management systems/networks, describes, for example, a search data processor tool used with a search engine to provide for refining search queries through the selective modification of search terms, and repackaging of search results.

Neither Goodwin, Pakhomov, Barney, nor Kravets, however, disclose, teach, or suggest, for example, performing an automated identification of a plurality of enterprise technology requirements based on a plurality of desired enterprise capabilities to identify and populate a dynamic reference repository with a plurality of pertinent inputs required to support the plurality of desired enterprise capabilities; mapping an enterprise technical requirement received from a procuring entity and a plurality of pertinent technologies providing different technical solutions to the desired capability to allow users to evaluate the plurality of different technical solutions to the received enterprise technical requirement; dynamically updating identified enterprise requirements received from a procuring entity; dynamically updating identified enterprise subject matter expert expertise for the enterprise; providing automated notice of the identified updates

made to the existing information resources to each of a plurality of users of the dynamic reference repository; providing an online communication including a link to an interactive enterprise website associated with the dynamic reference repository to conduct the SME review or assessment; generating a subject matter expert inputs request for information required to produce determined pertinent inputs to the dynamic reference repository to obtain the required pertinent inputs required to satisfy the desired capability; dynamically modifying a custom user search request prior to execution thereof responsive to past agent usage by the particular user or current search habits of the particular user to optimize returned search results; providing automated feedback to the customizable agent responsive to a user refusing the undesired information returned during the current dynamic agent search to update a next dynamic agent search; performing an automated recognition of a global replacement of a first name of a data item in one of the plurality of information resources with that of a second name responsive to contextual usage of the second name in the one of the plurality of information resources; running periodic prioritized customizable agent searches prioritized to specific reference materials; or integrating documents having the plurality of different document formats into a common standard format used within an enterprise architecture system for storage in the dynamic reference repository.

Nevertheless, Applicants offer a more detailed discussion below.

Independent Claims 1 and 17:

Independent Claim 1 features an automated identification of a plurality of enterprise information requirements and a plurality of enterprise technology requirements based on a plurality of desired enterprise capabilities to identify and populate the dynamic reference repository with a plurality of pertinent inputs required to support the plurality of desired enterprise capabilities.

Goodwin in view of Pakhomov was introduced as providing such teaching. As indicated on page 5 of the Office Action, Goodwin, however, does not teach identification of a plurality of enterprise technology requirements. Pakhomov, in the field of probabilistic modeling of text, was introduced as teaching identifying enterprise technology requirements through its description of use of surrounding terms and discourse characterizations of terms in a health record by type of medical service (e.g., cardiology, rheumatology, and endocrinology).

Applicants respectfully submit that the cardiology, rheumatology, and endocrinology described in col. 4, lines 40-49, are a type of record/service and not a plurality of enterprise technology requirement(s) identified based on a plurality of desired enterprise capabilities to enable identifying and populating a dynamic reference repository with a plurality of pertinent inputs required to support the desired enterprise capabilities. Applicants reviewed the cited documents but were unable to identify a teaching of (1) automated identification of (2) a plurality of enterprise information requirements and (3) a plurality of enterprise technology requirements based on (4) a *plurality* of desired enterprise capabilities. If the rejection is maintained, Applicants respectfully request individual identification of each sub element.

Further, Independent Claim 1 was amended to feature: dynamically updating identified enterprise requirements received from a procuring entity responsive to receiving updates to one or more of the following: operational requirements, system requirements, technical requirements, and standards requirements; dynamically updating identified enterprise technologies responsive to receiving updates to one or more of the following: basic science, technological theory, technological solutions, and technological sources; and dynamically updating a knowledge map between enterprise requirements, enterprise technology, and enterprise capabilities responsive to the updated identified enterprise requirements and the updated identified enterprise technologies when occurring, featured in prior dependent Claim 3.

Although Pakhomov was introduced as teaching, for example, dynamically updating identified enterprise technologies responsive to receiving updates to certain information sources, Applicants respectfully submit that Pakhomov provides no description of identifying enterprise technologies needed to support such certain enterprise capabilities nor any description of updating such technologies responsive to receiving such updates.

Further, although Goodwin, for example, was introduced as teaching "dynamically updating a knowledge map between enterprise requirements, enterprise technology, subject matter expert expertise, and enterprise capabilities responsive to the updated identified enterprise requirements, updated identified enterprise technologies, and updated identified enterprise subject matter expert expertise," Applicants respectfully submit that the Goodwin knowledge map (taxonomy) is instead a map of the relationship between undefined organizational resources, particularly, "a hierarchal representation of content organized by a suitable builder process." As

such, the existence of the Goodwin knowledge map does not provide such detailed features found in the claim.

Still further, Applicants wish to point out that the claim features a dynamic reference repository and a knowledge map as two separate elements. It is, however, Applicants understanding that the Goodwin knowledge map is being equated with being a dynamic reference repository. As such, Goodwin does not teach or suggest such separate independent elements as featured in the claim.

Accordingly, although Applicants submit that there would be no motivation to combine reference teachings due to disparities between the "field of the invention" of the cited documents and disparities between the subject matter contained therein, even if motivation were somehow found, Applicants submit that the cited documents do not teach each and every claim element. Correspondingly, Independent Claim 1 defines over the cited documents. Independent Claim 17 also defines over the cited documents under a similar line of reasoning.

Independent Claims 31 and 44:

Independent Claims 31 features an automated customizable software agent configured to communicate with a plurality of information resources and stored knowledge in a dynamic reference repository, the customizable software agent...including at least one utility configured to initiate contact with a SME with an online communication and to conduct a subject matter expert (SME) review or assessment of an *enterprise* technology or a desired *enterprise* capability, with the online communication including a link to an interactive enterprise website associated with the dynamic reference repository to conduct the SME review or assessment, as featured in Claim 5 as amended (discussed below) and indicated during the interview as comprising subject matter which defines over the cited references.

Accordingly, although Applicants submit that there would be no motivation to combine reference teachings, even if motivation were somehow found, Applicants submit that the cited documents do not teach each and every claim element. Correspondingly, Independent Claim 31 defines over the cited documents. Independent Claim 44 also defines over the cited documents under a similar line of reasoning.

Dependent Claims 2, 18, and 45

Claim 2, for example, features mapping (1) an enterprise technical requirement received from a procuring entity and (2) a plurality of pertinent technologies providing different technical solutions to (3) a desired capability. Although Goodwin, for example, was introduced as teaching mapping an enterprise technical requirement received from a procuring entity, Applicants submit that the threshold for affinities described in col. 6, line 10, is not an enterprise technical requirement, is not being mapped, and is not received from a procuring entity. Also, the taxonomist (editor), col. 5, lines 15-16, and administrator, col. 6, line 10, would not be considered a procuring entity by one of ordinary skill in the art.

Accordingly, Applicants submit that dependent Claim 2 defines over the cited documents. Dependent Claims 18 and 45 also define over the cited documents under a similar line of reasoning.

Dependent Claims 3, 19, and 46

As described with respect to Independent Claims 1 and 17, neither of the references alone, or in combination, teach dynamically updating identified enterprise requirements provided by a procuring entity...; or dynamically updating identified enterprise technologies... as detailed in Claims 1 and 17 (for the reasons described therewith). Nor do either of the references, alone, or in combination, teach dynamically updating identified enterprise *subject matter expert expertise for the enterprise* responsive to receiving updates to one or more of the following: enterprise subject matter expert operational experience, systems experience, and technical experience, or dynamically updating a knowledge map between enterprise requirements, enterprise technology, *subject matter expert expertise*, and enterprise capabilities.

Accordingly, Applicants submit that dependent Claim 3 defines over the cited documents. Dependent Claims 19 and 46 also define over the cited documents under a similar line of reasoning.

Dependent Claims 4, 20, and 47

Claim 4, for example, features (1) providing automated notice of (2) the identified updates made to existing information resources (3) to each of a plurality of users of the dynamic reference repository, and (4) analyzing and drawing logical linkages between (a) stored repository documents, (b) capability assessments directed to the enterprise, and (c) enterprise subject matter expert inputs.

Although Goodwin, for example, was introduced as providing notice of identified updates made to existing information resources via providing different search results, Applicants submit that such would not be a notification to the user of any specific identified updates to the "base" information sources. Nor does Goodwin teach capability assessments directed to the enterprise or logical linkages to capability assessments or enterprise subject matter inputs. People data source 106 appears to only list people for establishing affinities and not subject matter expert inputs (based on operational experiments, systems experiments, and technical experience) used as a data source for satisfying desired enterprise capabilities.

Accordingly, Applicants submit that dependent Claim 4 defines over the cited documents. Dependent Claims 20 and 47 (and Claims 36 and 39) also define over the cited documents under a similar line of reasoning.

Dependent Claims 5 and 22

Claim 5, for example, features a customizable agent further comprising at least one utility configured to initiate contact with a SME with an online communication and to conduct a SME review or assessment of an *enterprise* technology or an *enterprise* capability, with the online communication including a link to an interactive enterprise website associated with the dynamic reference repository to conduct the SME review or assessment.

Although Goodwin was introduced as teaching retrieving pertinent inputs from subject matter experts for the enterprise, Applicants submit that directory source 116 provides access to a directory of people and not "pertinent inputs" (knowledge to add to the repository) from the people. Further, although Barney, in the unrelated field of computer-based systems and methods for assessing work requirements relating to jobs and linking human resource products to the



assessed jobs, was introduced as teaching providing an online communication to initiate contact with a subject matter expert to conduct a subject matter expert review or assessment of a technology or capability, Applicants submit that only a job analysis survey is made available. Nothing indicates that the survey covers an enterprise technology or capability assessments or that the website having the link to the survey is configured to be in the form of an interactive enterprise website associated with a dynamic reference repository.

Accordingly, Applicants submit that dependent Claim 5 defines over the cited documents. Dependent Claim 22 also defines over the cited documents under a similar line of reasoning.

Dependent Claims 8 and 25

Claim 8, for example, features an automated software agent including a utility to perform the step of generating a subject matter expert inputs request for information required to produce determined pertinent inputs to obtain the required pertinent inputs required to satisfy a desired capability. Although Goodwin was introduced as teaching generating a subject matter expert request for information required to produce pertinent inputs to the dynamic reference repository, Applicants submit that the providing of a notification of proposed affinity information between a specific person and a document, at best, would be considered a request for inputs for affinity mapping, and not for subject matter expertise to produce inputs to populate a dynamic reference repository.

Accordingly, Applicants submit that dependent Claim 8 defines over the cited documents. Dependent Claim 25 also defines over the cited documents under a similar line of reasoning.

Dependent Claims 10, 23, and 48

Claim 10, for example, features providing automated feedback to a customizable [software] agent responsive to a user refusing the undesired information returned during the current dynamic agent search to update a next dynamic agent search.

Although Kravetz was introduced as teaching dynamically modifying a custom user search request used to update a dynamic reference repository responsive to past customizable agent usage, search habits of the user, and characteristics of the particular user, and was introduced as teaching updating a next search based on return of undesired information, Applicants submit that the cited passages instead describe a simple search focus that repackages the same search results data within a simple user search in a different order, and not an update of a next search used to populate a dynamic reference repository based on selective rejection of certain results.

Accordingly, Applicants submit that dependent Claim 10 defines over the cited documents. Dependent Claims 23 and 48 (and Claims 37 and 40) also define over the cited documents under a similar line of reasoning.

Dependent Claims 11, 16, 26, and 49

Claim 11, for example, features an automated recognition of a global replacement of a first name of a data item in one of the plurality of information resources with that of a second name responsive to contextual usage of the second name in the one of the plurality of information resources, and redefining the first name of the data item to that of the second name responsive to the automated recognition of the global replacement of the first name of the data item in the respective information resource....

Pakhomov was introduced as performing an automated recognition of a global replacement of a word. Pakhomov, however, describes developing vectors used to associate an acronym with the expanded version of the acronym and recognizing the acronym based on its usage. Applicants submit that nothing is described of recognizing any wholesale replacement of either the expanded version with a different word/phrase, or the wholesale replacement of the associated acronym with a *different* acronym, which, of course, by its nature would not have been pre-trained in accordance with the requirements of Pakhomov.

Accordingly, Applicants submit that dependent Claim 11 defines over the cited documents. Dependent Claims 16, 26, and 49 (and Claims 30, 38, and 50) also define over the cited documents under a similar line of reasoning.

Dependent Claims 12 and 21

Claim 12, for example, features running periodic prioritized customizable agent searches prioritized to specific reference materials, and automated time stamping of the discovered pertinent inputs with current time....

Although Goodwin was introduced as teaching running periodic prioritized customizable agent searches prioritized to specific reference materials (the Goodwin training set), Applicants submit that nothing indicates that such searches of the training set "used to build a first draft of a knowledge map" would be periodically run to discover inputs for a dynamic reference repository, rather than just initially to build the first draft. Further, Applicants submit that the existence of a timestamp on a base document does not teach time stamping of discovered pertinent inputs with "current" (discovery/save to repository) time.

Accordingly, Applicants submit that dependent Claim 12 defines over the cited documents. Dependent Claim 21 also defines over the cited documents under a similar line of reasoning.

Dependent Claims 13 and 27

Claim 13, for example, features a customizable agent that integrates retrieved documents having a plurality of different document formats into a common standard format used within an enterprise architecture system...prior to storage in the dynamic reference repository, and storing the retrieved documents in the common standard format.

Although Goodwin was introduced as teaching integrating retrieved documents into XML format, Applicants submit that no description is provided with respect to saving such documents collectively into a dynamic reference repository containing documents having such format.

Accordingly, Applicants submit that dependent Claim 13 defines over the cited documents. Dependent Claim 27 also defines over the cited documents under a similar line of reasoning.

Depending Claim 32

Claim 32, for example, features conducting the SME review or assessment of the enterprise technology or the desired enterprise capability through an interactive enterprise website, and refining a desired enterprise capability responsive to the SME review or assessment.

Although Goodwin was introduced as teaching retrieving pertinent inputs from subject matter experts for the enterprise, Applicants submit that directory source 116 provides access to a directory of people and not "pertinent inputs" (knowledge to add to the repository) from the people. Further, although Barney, in the unrelated field of computer-based systems and methods for assessing work requirements relating to jobs and linking human resource products to the assessed jobs, was introduced as teaching providing an online communication to initiate contact with a subject matter expert to conduct a subject matter expert review or assessment of a technology or capability, Applicants submit that only a job analysis survey is made available. Nothing indicates that the survey covers an enterprise technology or enterprise capability assessments.

Accordingly, Applicants submit that dependent Claim 32 defines over the cited documents.

Correspondingly, Applicants respectfully submit that neither of the cited patent documents, alone nor in combination, disclose, teach, or suggest the various featured steps/operations or processing module to perform featured steps/operations, as set forth in Claims 1-5, 8, 10-13, 15-23, 25-27, 29-33, 36-40, and 44-50. Reconsideration, therefore, is respectfully requested.

In commenting upon the references and in order to facilitate a better understanding of the differences that are expressed in the claims, certain details of distinction between the cited documents and the claimed embodiments of the present invention have been mentioned, even though such differences do not appear in all of the claims. It is not intended by mentioning any such unclaimed distinctions to create any implied limitations in the claims. Not all of the distinctions between the cited documents and the claimed embodiments of Applicants' present invention have been made by Applicants. For the foregoing reasons, Applicants reserve the right

to submit additional evidence showing the distinctions between claimed embodiments of Applicants' invention to be novel and nonobvious in view of the cited documents.

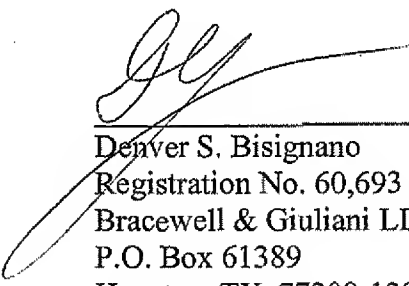
The foregoing remarks are intended to assist the Examiner in re-examining the application and in the course of explanation may employ shortened or more specific or variant descriptions of some of the claim language. Such descriptions are not intended to limit the scope of the claims; the actual claim language should be considered in each case. Furthermore, the remarks are not to be considered to be exhaustive of the facets of the claimed embodiments of the invention that render it patentable, being only examples of certain advantageous features and differences that Applicants' attorney chooses to mention at this time.

**CONCLUSION**

In view of the amendments and remarks set forth herein, Applicants respectfully submit that the Application is in condition for allowance and issue. Accordingly, the issuance of a Notice of Allowance in due course is respectfully requested.

Respectfully submitted,

Date: 11-19-2009



---

Denver S. Bisignano  
Registration No. 60,693  
Bracewell & Giuliani LLP  
P.O. Box 61389  
Houston, TX 77208-1389  
(713) 221-1491;  
(713) 437-5346 (fax)